

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

J.A. CASTRO,	§	
Plaintiff,	§	
	§	
VS.	§	Case No. 4:23-cv-00613-P-BJ
	§	
JOHN DOE 1 (a.k.a. “CHETSFORD”), et al.	§	
Defendants,	§	

**APPENDIX TO BRIEF IN SUPPORT OF MOTION FOR SANCTIONS BY
DEFENDANT JOHN DOE 1 (“Chetsford”)**

Defendant John Doe 1, aka Chetsford, hereby submits this Appendix with his Brief in Support of his motion for sanctions.

<u>Document</u>	<u>Appendix Number</u>
Chetsford Statement	APP3
Rosman Statement (with exhibit)	APP5

Respectfully submitted,

/s/ Michael E. Rosman
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Attorneys for John Doe 1 (Chetsford)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

J.A. CASTRO,
 Plaintiff,

VS.

JOHN DOE 1 (a.k.a. “CHETSFORD”), et al.
 Defendants,

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Case No. 4:23-cv-00613-P

“CHETSFORD” STATEMENT

1. I am the Wikipedia editor/administrator known as “Chetsford,” sued in this action as John Doe 1. I submit this statement in support of my motion for Rule 11 sanctions against Plaintiff J.A. Castro.

2. I drafted a Wikipedia article about Plaintiff because of my general interest in less well-known candidates for President. No one asked me to write the article, and no one paid me to do so. I have not knowingly spoken to anyone associated with Donald Trump’s campaign organizations (including Mr. Trump) for any reason.

3. I have never fabricated a document from the Florida Bar. While I am not entirely sure I know what document Plaintiff is speaking about in paragraph 14 of the Third Amended Verified Complaint – a document that “warns Plaintiff not to identify as an International Tax Attorney” (Doc. 36, ¶ 14) – I have seen a document that may fit that description in various court filings, including in this Court. *See, e.g., Castro v. Berg*, N.D. Tex. No. 3:18-cv-573, Doc. 15-3 (filed August 16, 2018).

4. I note in passing that previous “verified” complaints in this action alleged that

another anonymous defendant (John Doe 2) fabricated the document in question.

I state under penalty of perjury that the foregoing is true and correct. Executed on
January 31, 2024.

redacted

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FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

J.A. CASTRO,
 Plaintiff,

VS.

JOHN DOE 1 (a.k.a. “CHETSFORD”), et al.
 Defendants,

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§

Case No. 4:23-cv-00613-P

MICHAEL E. ROSMAN STATEMENT

1. I am the General Counsel of the Center for Individual Rights and one of the attorneys representing John Doe 1, aka “Chetsford,” in this lawsuit. I submit this statement in support of John Doe 1’s motion for Rule 11 sanctions against Plaintiff J.A. Castro.

2. I have in my possession an unredacted version of the Chetsford statement that is being submitted to the Court in support of John Doe 1’s motion. It is identical to the redacted version that was submitted except that it has Chetsford’s actual name and signature.

3. Accompanying this statement as Exhibit 1 is a document from the docket in *Castro v. Scanlan*, D.N.H. Case No. 1:23-cv-00416.

I state under penalty of perjury that the foregoing is true and correct. Executed on February 6, 2024.

/s/ Michael E. Rosman

Michael E. Rosman

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

JOHN ANTHONY CASTRO
12 Park Place, Mansfield, TX 76063

Plaintiff,

v.

SECRETARY OF STATE DAVID
SCANLAN
107 North Main Street, Room 204, Concord,
NH 03301

DONALD JOHN TRUMP
1100 S. Ocean Blvd, Palm Beach, FL 33480

Defendants.

Case No. 1:23-cv-00416

PLAINTIFF'S VERIFIED STIPULATION TO CERTAIN FACTS

Plaintiff John Anthony Castro, *pro se*, stipulates to the following facts sought by Defendant Donald John Trump.

1. Plaintiff has declared his candidacy for the Republican nomination for the Presidency of the United States.
2. Plaintiff has filed his Declaration of Candidacy with the New Hampshire Secretary of State and paid the required fee.
3. Plaintiff has not been mentioned in any New Hampshire Republican primary polls publicly reported in 2023.
4. Plaintiff's status as a longshot Republican Presidential candidate has been covered by every major national media news outlet, including, but not limited to, the Associated Press, Reuters, NBC, ABC, CBS, CNN, Fox News, Politico, The Hill, The Washington Post, News, the

New York Times, the New York Post, Forbes, Bloomberg News, the Boston Globe, the New York Sun, and the Washington Times, the Daily Caller, among others.

5. In New Hampshire, particularly, Plaintiff has been featured on the local news with ABC affiliate WMUR 9 based in Manchester and the New Hampshire Bulletin based in Concord.

6. On the October Quarterly FEC Form 3P, filed 10/12/2023, covering the period January 1, 2023-September 30, 2023, Plaintiff's principal campaign committee reported total contributions of \$678. These were small contributions all less than \$50. If they were incorrectly reported as donations from Plaintiff, it will be corrected.

7. On the October Quarterly FEC Form 3P, filed 10/12/2023, covering the period January 1, 2023-September 30, 2023, Plaintiff's principal campaign committee reported total expenditures of \$0.

8. Plaintiff does not yet have a campaign office in New Hampshire.

9. Plaintiff does not yet have employees in New Hampshire.

10. Plaintiff's campaign is not yet running any advertisements in New Hampshire. Plaintiff's campaign strategy is to postpone advertising until the right moment. Considering Plaintiff was born into a lower working-class family and now has a tax firm generating an average of \$3 million annually, has two law degrees including a Master of Laws from Georgetown Law, and is an alum of Harvard Business School, Plaintiff's professional judgment is hardly questionable. Keep watching and learn.

11. Plaintiff's campaign is not yet engaging in campaign activities in New Hampshire other than this lawsuit, which reminds Plaintiff of Defendant Donald Trump trolling then-President Obama over his birth certificate in order to increase his national political profile. Plaintiff did not

become a successful and wealthy entrepreneur by making bad decisions based on bad odds. Timing is everything. Keep watching and learn.

12. Presently, Plaintiff's campaign has no serious prospect of getting any New Hampshire delegates to the Republican National Convention, nor any significant number of votes that would otherwise have gone to Donald Trump, nor any appreciable share of donations that otherwise would have gone to Donald Trump; as of right now.

13. If Defendant Secretary of State was enjoined from processing Defendant Donald John Trump's ballot access documentation, printing ballots bearing the name of Defendant Donald John Trump, and disregarding write-in votes in favor of Defendant Donald John Trump, it is factually certain that Defendant Donald John Trump could not win New Hampshire.

14. Plaintiff is a candidate whose name will be on the ballot. Plaintiff is a pragmatic realist. Plaintiff understands the odds of a successful campaign are low, but Plaintiff also understands that many Presidents lost their first elections. Lyndon B. Johnson ran in the Democratic primary in 1960 and lost. Johnson went on to win the 1964 presidential election. Richard Nixon lost the general election in 1960. Nixon went on to win the 1968 presidential election. George H.W. Bush lost the 1980 primary. Bush went on to win the 1988 presidential election.

15. As Defendant Donald John Trump pointed out, Plaintiff has \$677 in his campaign account. Despite having only \$677, Plaintiff has managed to garner global news coverage with every major news network and has forced former President Donald J. Trump to respond to him. Now imagine what Plaintiff will accomplish with a full campaign staff and millions of dollars.

16. One of many goals of this campaign is for Plaintiff to demonstrate his legal ingenuity, ability to effectuate a national litigation strategy with minimal resources (*i.e.*, guerilla lawfare), and demonstrate executive leadership capabilities.

17. Defendant Donald John Trump's assertion that Plaintiff is not a "bona fide" candidate is frivolous.

18. Plaintiff intends to one day serve this nation as President of the United States.

Pursuant to Verification,

By: /s/ John Anthony Castro
John Anthony Castro
12 Park Place
Mansfield, TX 76063
(202) 594 – 4344
J.Castro@JohnCastro.com
Plaintiff Pro Se

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I, John Anthony Castro, verify, under criminal penalty of perjury, that the entirety of the foregoing document, including any and all accompanying exhibits, are unequivocally true and correct.

Executed on October 18, 2023.

/s/ John Anthony Castro
John Anthony Castro

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was personally filed in-person with the Clerk of the Court on October 11, 2023. I further certify that a true and accurate

copy of the foregoing document will be served via CM/ECF on all parties; all of whom are registered with CM/ECF.

/s/ John Anthony Castro
John Anthony Castro